

EXHIBIT E

WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
William A. Maher
Paul R. DeFilippo
James N. Lawlor

Special Litigation Counsel
for the Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : Chapter 11
LEHMAN BROTHERS HOLDINGS INC., *et al.* : Case No. 08-13555 (JMP)
Debtors. :
x

**FOURTH MONTHLY FEE APPLICATION OF WOLLMUTH
MAHER & DEUTSCH LLP FOR COMPENSATION OF SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION**

Name of Applicant: Wollmuth Maher & Deutsch LLP

Authorized to Provide Professional Services to: Debtors and Debtors-in-Possession

Date of Retention: Order Entered October 20, 2010 [Docket No. 11872]
Nunc Pro Tunc to September 9, 2010

Compensation Period: January 1, 2011 to January 31, 2011

Amount of Compensation Sought: \$117,170.00

Amount of Expense Reimbursement Sought: \$10,667.96

80% of Compensation Sought as Actual, Reasonable and Necessary: \$93,736.00

This is a: Monthly Interim Final Application

This is Wollmuth Maher & Deutsch LLP's fourth monthly fee application in this case.

Timekeeper Summary

| Timekeeper | Position | Year of Admission | Rate | Hours | Amount |
|---------------------|-----------------|---|-------------|--------------|---------------|
| William A. Maher | Senior Partner | Area of Expertise: Litigation. Member of the New York Bar (1986), New Jersey Bar (1998). Joined the firm in 1998. | 595.00 | 3.40 | \$2,023.00 |
| Sandip Bhattacharji | Partner | Area of Expertise: Litigation. Member of the New York Bar (1991). Joined the firm in 2006. | 550.00 | 4.30 | 2,365.00 |
| Vince Change | Partner | Area of Expertise: Litigation. Member of the New York Bar (1990). Joined the firm in 2002. | 550.00 | 0.20 | 110.00 |
| William F. Dahill | Partner | Area of Expertise: Litigation. Member of the New York Bar (1992). Joined the firm in 1998. | 550.00 | 26.10 | 14,355.00 |
| James N. Lawlor | Partner | Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (1993), New Jersey Bar (1992). Joined the firm in 2002. | 550.00 | 16.20 | 8,910.00 |
| Randall Rainer | Partner | Area of Expertise: Litigation. Member of the New York Bar (1995). Joined the firm in 2000. | 550.00 | 4.70 | 2,585.00 |
| Michael C. Ledley | Counsel | Area of Expertise: Litigation. Member of the New York Bar (2001). Joined the firm in 2010. | 495.00 | 11.50 | 5,692.50 |
| Adam M. Bialek | Associate | Area of Expertise: Litigation. Member of the New York Bar (2002), New Jersey Bar (2002). Joined the firm in 2005. | 395.00 | 97.70 | 38,591.50 |

| | | | | | |
|-------------------------|-----------|--|--------------|---------------|---------------------|
| Serena Parker | Associate | Area of Expertise: Litigation. Member of the New York Bar (2002). Joined the firm in 2004. | 425.00 | 24.80 | 10,540.00 |
| John D. Giampolo | Associate | Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (2005), New Jersey Bar (2005). Joined the firm in 2010. | 350.00 | 12.90 | 4,515.00 |
| Christopher G. Passavia | Associate | Area of Expertise: Litigation. Member of the New York Bar (2010). Joined the firm in 2010. | 250.00 | 36.40 | 9,100.00 |
| Alexis Castillo | Associate | Area of Expertise: Litigation. Member of the New York Bar (2010). Joined the firm in 2009. | 250.00 | 42.30 | 10,575.00 |
| Autumn J. Anderson | Paralegal | | 110.00 | 6.50 | 715.00 |
| Matthew Bost | Paralegal | | 110.00 | 43.40 | 4,774.00 |
| Kyle J. Dumas | Paralegal | | 110.00 | 9.50 | 1,045.00 |
| Martina Frederick | Paralegal | | 110.00 | 0.70 | 77.00 |
| Melissa Metzger | Law Clerk | | 110.00 | 6.30 | 693.00 |
| Katia Sperduto | Paralegal | | 120.00 | 4.20 | 504.00 |
| | | | Total | 351.10 | \$117,170.00 |

SUMMARY OF SERVICES

| SERVICE | HOURS | VALUE |
|--------------------------------------|---------------|---------------------|
| Claims Administration and Objections | 0.60 | \$348.00 |
| Fee/Employment Application | 2.00 | 700.00 |
| Avoidance Action Litigation | 348.50 | 116,122.00 |
| Subtotal: | 351.10 | \$117,170.00 |
| Less ½ Travel Time | 0.00 | (0.00) |
| TOTAL SERVICES: | 351.10 | \$117,170.00 |

SUMMARY OF DISBURSEMENTS

| DISBURSEMENTS | VALUE |
|---------------------------------------|--------------------|
| 1. Duplicating (@ \$0.10 per page) | \$41.60 |
| 2. Postage Expense | 541.24 |
| 3. Facsimile (@ \$1.00 per page) | 2.00 |
| 4. Legal Research (Lexis Nexis/Pacer) | 431.92 |
| 5. Transportation – Elite Car Service | 1,082.04 |
| 6. Working Dinner | 121.72 |
| 7. Local Travel | 239.40 |
| 8. Federal Express | 141.32 |
| 9. ALM Media | 10.80 |
| 10. Lawyer Service – Demovsky | 5,027.92 |
| 11. Filing Fee | 2,188.00 |
| 12. Witness Fee | 840.00 |
| TOTAL DISBURSEMENTS: | \$10,667.96 |

WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
William A. Maher
Paul R. DeFilippo
James N. Lawlor

Special Counsel for the Debtors and
Debtors In Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|-------------------------|
| In re: | : | x |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> | : | Chapter 11 |
| Debtors. | : | Case No. 08-13555 (JMP) |
| | : | x |

**FOURTH MONTHLY FEE APPLICATION OF WOLLMUTH MAHER &
DEUTSCH LLP FOR COMPENSATION OF SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO
THE DEBTORS AND DEBTORS-IN-POSSESSION**

By this application (the “Application”), pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Wollmuth Maher & Deutsch LLP (“Wollmuth” or the “Firm”) hereby seeks reasonable compensation in the above-captioned cases (the “Debtors”), for professional legal services rendered as counsel to the Debtors in the amount of \$117,170.00, together with reimbursement for actual and necessary expenses incurred in the amount of \$10,667.96 for the period commencing January 1, 2011 through and including January 31, 2011 (the “Compensation Period”). Pursuant to Third Amended Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals dated June 25,

2009 [Docket No. 4165] establishing procedures for interim compensation and reimbursement of professionals (the “Compensation Order”), Wollmuth seeks reimbursement of 80% of its total reasonable and necessary fees incurred, in the amount of \$93,736.00, together with 100% reimbursement for actual and necessary expenses incurred in the amount of \$10,667.96, for the Compensation Period. In support of this Application, Wollmuth represents as follows:

BACKGROUND

1. Commencing on September 15, 2008 and periodically thereafter (as applicable, the “Commencement Date”), LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors’ chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
2. On September 17, 2008, the United States Trustee for the Southern District of New York (the “U.S. Trustee”) appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the “Creditors’ Committee”).
3. On September 19, 2008, a proceeding was commenced under the Securities Investor Protection Act of 1970 (“SIPA”) with respect to Lehman Brothers Inc. (“LBI”). A trustee appointed under SIPA is administering LBI’s estate.
4. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as examiner in the above-captioned chapter 11 cases (the “Examiner”) and by order, dated January 20, 2009 [Docket No. 2583] the Court approved the U.S. Trustee’s appointment of the Examiner. The

Examiner issued a report of his investigation pursuant to section 1106 of the Bankruptcy Code on March 11, 2010 [Docket No. 7531].

5. On April 14, 2010, the Debtors filed a revised joint chapter 11 plan and disclosure statement [Docket Nos. 8330 and 8332].

6. On October 1, 2010, the Debtors filed an application [Docket No. 11761] to retain Wollmuth to serve as conflicts and special litigation counsel, in connection with the prosecution of certain avoidance actions brought pursuant to sections 547 and 548 of the Bankruptcy Code and other related claims, and such other litigation related matters as may be assigned by the Debtors (together, the "Representative Matters").

7. On October 28, 2010, this Court entered an Order that approved Wollmuth's retention as counsel to the Debtors [Docket No. 11872] (the "Retention Order") *nunc pro tunc* to September 9, 2010.

JURISDICTION AND VENUE

8. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code.

RELIEF REQUESTED

9. Wollmuth submits this Application in accordance with the Compensation Order. All services for which Wollmuth requests compensation were performed for, or on behalf of, the Debtors. In connection with the professional services rendered, by this Application, Wollmuth seeks compensation in the amount of \$93,736.00 (80% of the actual compensation of \$117,170.00) and expense reimbursement of \$10,667.96. Attached hereto as Exhibit A is a

detailed explication of hours spent rendering legal services to the Debtors supporting Wollmuth's request of \$93,736.00 in compensation for fees incurred during the Compensation Period. Attached hereto as Exhibit B is a detailed list of disbursements made by Wollmuth supporting its request of \$10,667.96 in expense reimbursement for the Compensation Period.

10. Given the nature and value of the services that Wollmuth provided to the Debtors as described herein, the amounts sought under this Application are fair and reasonable under section 330 of the Bankruptcy Code given the complexity of this case; the time expended by attorneys and professionals; the nature and extent of the services rendered; the value of such services; and the costs of comparable services other than in a case under the Bankruptcy Code.

11. Wollmuth has received no payment and no promises for payment from any source for services rendered in connection with this case other than those in accordance with the Bankruptcy Rules. There is no agreement or understanding between Wollmuth and any other person (other than members of Wollmuth) for the sharing of compensation to be received for the services rendered in this case.

SUMMARY OF SERVICES RENDERED

12. In rendering services to the Debtors during its chapter 11 case, the Firm's legal team has been composed primarily of professionals with extensive experience in bankruptcy and in the applicable legal practice areas for the matters for which the Firm was retained. These professionals have coordinated assignments, both internally and with the Debtors' general counsel, Weil, Gotshal & Manges, LLP, and conflicts counsel, Curtis Mallet-Prevost, Colt & Mosle, LLP, to maximize efficiency and avoid any duplication of effort.

13. All services were rendered by Wollmuth at the request of the Debtors and were necessary, reasonable and appropriate under the circumstances and beneficial to the estate at the

time the services were rendered. The compensation sought by Wollmuth in this Application is comparable to or less than customary compensation sought by comparably skilled professionals in cases under the Bankruptcy Code. In addition, the compensation sought is based on Wollmuth's standard and usual rates for similar services in representations other than under the Bankruptcy Code.

14. The services provided by Wollmuth during the Compensation Period were rendered to ensure no unnecessary duplication and are grouped into the billing categories set forth in Exhibit A. The attorneys and professionals who rendered services relating to each category are identified in the above attachment and summaries of the hours and fees of each for the Compensation Period and the total compensation by billing category are included in Exhibit A. Because detailed invoices of the services rendered by Wollmuth are attached as Exhibit A, the following descriptions will describe only in summary form the services performed by Wollmuth.

A. **SPV Payment Priority Litigation - 001**

15. The largest portion of the Firm's services during the Compensation Period were provided in connection with the continued prosecution of an adversary proceeding (i) to prevent certain unenforceable *ipso facto* clauses from improperly modifying the right of Lehman Brothers Special Financing Inc. ("LBSF") to priority of payment of more than \$3 billion dollars under certain transaction documents related to credit default swap agreements based solely upon the filing of LBSF and its ultimate parent, LBHI, for bankruptcy; and (ii) to recover funds that were improperly paid to noteholders.¹ On September 9, 2010, the Firm was formally asked to

¹ The Firm filed an adversary captioned Lehman Bros. Spec. Fin., Inc. v. Bank of America, N.A., Adv. Proc. No. 10-03547 (JMP).

serve as counsel as a result of conflicts of interest identified by Weil, Gotshal and Curis Mallet-Prevost firms.

16. During the Compensation Period, the Firm prepared expedited discovery requests to named defendants and relevant third parties in an effort to quickly identify the beneficial noteholders that may need to be added as additional defendants in the litigation, as well as to obtain other critical information. The Firm also focused significant time and effort in serving process and discovery requests on the multiple named defendants and relevant third parties, both within and outside the United States. These services included coordinating with multiple process services in multiple jurisdictions, reviewing and analyzing various documents to confirm that proper service was effected, and engaging in numerous communications with various defendants, third parties, and counsel for defendants and third parties to address various issues raised by defendants and third parties with respect to discovery requests.

17. The Firm also continued to monitor important developments in the Lehman proceeding that had implications for the litigation, such as the Debtors' notice involving derivative counter party ADR procedures and the objections thereto.

18. Members of the Firm also researched and addressed critical legal and factual issues that arose in the litigation during the Compensation Period.

19. The Firm kept in constant contact with the Debtors' management team and other counsel to coordinate efforts and to maintain a common legal position with various related litigations.

B. Derivative Close Out Claims - 002

20. Shortly after the Firm began preparing the adversary complaint discussed above, as a result of yet another conflict, the Firm was asked to render services related to disputed

unsecured claims of approximately \$2.5 billion filed by three (3) Goldman Sachs entities. The unsecured claims arose from the termination and close out of approximately 57,000 derivative transactions under certain ISDA Master Agreements. The Firm continues to support the Debtors' efforts to resolve the claims in a structured, but informal process.

C. Koch Avoidance Litigation - 003

21. The Firm was asked to assist in the potential filing of an avoidance action involving certain Koch entities. While the Debtors had previously reached an agreement with the Koch entities to toll the statute of limitations, the Firm was advised that the agreement may be terminated shortly by the Koch entities. Accordingly, the Firm began on an expedited basis to prepare should litigation have to be filed to preserve the estates' rights.

22. In addition, the Firm assisted the Debtors in preparing for the potential that the Koch matters be addressed in the Debtors' existing alternative dispute resolution ("ADR") procedures or by a modified form of same. Accordingly, members of the Firm worked closely with the Debtor's management and other counsel to coordinate both a potential amendment of the tolling agreement with the Koch entities and the potential noticing and prosecution of an ADR proceeding. The Firm also worked to address potential discovery and damages issues raised by the Koch entities. In addition, the Committee's counsel presented the Debtors with comments to the proposed ADR notices, which the Firm addressed.

C. CEAGO Avoidance Litigation - 004

23. Another portion of the Firm's services during the Compensation Period were provided in connection the filing and service of an adversary proceeding to prevent certain unenforceable *ipso facto* clauses from improperly modifying the right of LBSF to priority of payment of more than approximately \$150 million in collateral in connection with a

collateralized debt obligation transaction called Ceago ABS CDO 2007-1 (“Ceago Transaction” or the “Ceago Note”).² The Debtors previously had entered into a tolling agreement with the potential defendants as to the Ceago Transaction. However, the tolling agreement had been terminated by the non-Debtor parties and was to expire on or about November 30, 2010. The Firm was formally asked to serve as counsel as a result of conflicts of interest identified by Weil, Gotshal and Curis Mallet-Prevost firms.

24. The Debtors advised the Firm that it was critical that the complaint in the above matter be filed no later than November 29, 2010, after which the two-year statute of limitations under 11 U.S.C. § 546 may expire for any Chapter 5 avoidance actions needing to be brought in the Chapter 11 proceedings (which limitations period had been extended by the tolling agreement referenced above). Accordingly, the Firm filed a timely complaint.

25. In addition to the filing of the Ceago Transaction complaint, the Firm was also asked to simultaneously prepare and file a motion to extend the current stay of discovery that already applied to similar litigations to the Ceago litigation. In order to accomplish the obtaining of a stay, the Firm spent time communicating with counsel for Ceago and the Ad Hoc Creditor Group on the ADR procedures. Also, during the Compensation Period, the Firm spent time researching critical issues concerning the Ceago Transaction complaint.

COMPENSATION REQUESTED

26. For the Compensation Period, Wollmuth seeks compensation in the amount of \$93,736.00 (80% of the total fees of \$117,170.00 incurred during the Compensation Period) in connection with the professional services summarized above and detailed in Exhibit A, and total costs and expenses in the amount of \$10,667.96 as detailed in Exhibit B.

² The Firm filed an adversary encaptioned Lehman Bros. Spec. Fin., Inc. v. Bank of America, N.A., Adv. Proc. No. 10-04331 (JMP).

27. It is Wollmuth's policy to charge its clients in all areas of practice the amounts incurred by Wollmuth for identifiable, non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. Examples of such expenses are postage, overnight mail, courier delivery, computer assisted legal research, photocopying, outgoing facsimile transmissions, transportation and long-distance telephone.

28. Wollmuth represents as follows with regard to its charges for actual and necessary costs and expenses during the Compensation Period:

- (a) Long-distance telephone charges are billed at actual costs;
- (b) Photocopy charges are \$.10 per page;
- (c) Incoming facsimiles are not billed. Outgoing facsimiles are billed at the rate of \$1.00 per page; and,
- (d) Outside information services, including computer assisted legal research and PACER, are billed at actual costs.
- (e) car services are capped at \$100.00 per hour and only permitted for travel after 8:00 p.m.
- (f) meals charges are billed at actual cost but are capped at \$20 per person and are only charged for meals after normal business hours or on weekends

29. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amounts requested for compensation and expense reimbursement are fair and reasonable given: (a) the complexity of these cases; (b) the time expended; (c) the nature and extent of the services rendered; (d) the value of such services; and (e) the cost of comparable services other than in a case under the Bankruptcy Code.

30. The undersigned has reviewed the requirements of Local Rule 2016-2, and certifies that this Application and the Exhibits attached hereto comply therewith and a copy of

this Application has been sent to the parties set forth in the Compensation Order.

WHEREFORE, the Firm asks the Court to approve for the current Compensation Period the sum of \$93,736.00 representing the total compensation for professional services rendered, 80% or \$117,170.00, of which is to be currently paid, and the sum of \$10,667.96 for reimbursement of actual and necessary costs and expenses incurred by it in these cases from January 1, 2011 through January 31, 2011.

Respectfully submitted,

By: /s/ James N. Lawlor

William A. Maher

Paul R DeFilippo

James N. Lawlor

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Faxsimile: (212) 382-0050

Special Counsel for the
Debtors and Debtors-in-Possession

Dated: New York, New York
March 22, 2011

EXHIBIT A

Wollmuth Maher & Deutsch

500 Fifth Avenue, Suite 1200
New York, New York 10110

T: 212-382-3300
F: 212-382-0050

One Gateway Center, 9th Fl.
Newark, New Jersey 07102

T: 973-733-9200
F: 973-733-9292

Lehman Estate

March 18, 2011

File #: 4715-001
Inv #: 20416

Attention:

RE: SPV Avoidance Litigation

SUMMARY BY TASK

| Task | | Hours | Amount |
|--------------------|--------------------------------------|---------------|---------------------|
| C05 | Claims Administration and Objections | 0.60 | 348.00 |
| C07 | Fee/Employment Applications | 2.00 | 700.00 |
| C11 | Avoidance Action Litigation | 348.50 | 116,122.00 |
| Total | | 351.10 | \$117,170.00 |
| Grand Total | | 351.10 | \$117,170.00 |

SUMMARY BY TIMEKEEPER

This Invoice

| Timekeeper | Category | Rate | Hours | Amount |
|-------------------------|----------------|--------|-------|-----------|
| William A. Maher | Senior Partner | 595.00 | 3.40 | 2,023.00 |
| Sandip Bhattacharji | Partner | 550.00 | 4.30 | 2,365.00 |
| Randall R.Rainer | Partner | 550.00 | 4.70 | 2,585.00 |
| James N. Lawlor | Partner | 550.00 | 16.20 | 8,910.00 |
| Vince Chang | Partner | 550.00 | 0.20 | 110.00 |
| William F. Dahill | Partner | 550.00 | 26.10 | 14,355.00 |
| Adam M. Bialek | Junior Partner | 395.00 | 97.70 | 38,591.50 |
| Michael C. Ledley | Junior Partner | 495.00 | 11.50 | 5,692.50 |
| Serena Parker | Associate | 425.00 | 24.80 | 10,540.00 |
| Christopher G. Passavia | Associate | 250.00 | 36.40 | 9,100.00 |
| John D. Giampolo | Associate | 350.00 | 12.90 | 4,515.00 |
| Alexis Castillo | Associate | 250.00 | 42.30 | 10,575.00 |

Invoice #: 20416

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| | | | | |
|--------------------|-----------|--------|-------|----------|
| Matthew Bost | Paralegal | 110.00 | 43.40 | 4,774.00 |
| Martina Frederick | Paralegal | 110.00 | 0.70 | 77.00 |
| Kyle J. Dumas | Paralegal | 110.00 | 9.50 | 1,045.00 |
| Autumn J. Anderson | Paralegal | 110.00 | 6.50 | 715.00 |
| Katia Sperduto | Paralegal | 120.00 | 4.20 | 504.00 |
| Melissa Metzger | Law Clerk | 110.00 | 6.30 | 693.00 |

| | | |
|--------------|---------------|---------------------|
| Total | 351.10 | \$117,170.00 |
|--------------|---------------|---------------------|

DISBURSEMENT SUMMARY

| | | |
|------|-------------------------------|----------|
| ALM | ALM Invoice # | 10.80 |
| dem | Demovsky Lawyer Service Inv.# | 5,027.92 |
| Dnr | Working Dinner | 121.72 |
| Elit | Elite (Car Service) Inv. # | 1,082.04 |
| FDX | Federal Express Inv # | 141.32 |
| ff | Filing Fee | 2,188.00 |
| fx | Facsimiles | 2.00 |
| lex | Lexis Nexis Inv. # | 431.92 |
| lo | Local Travel | 239.40 |
| phx | Photocopy Expense | 41.60 |
| psx | Postage Expense | 541.24 |
| wit | Witness Fee | 840.00 |

| | |
|----------------------------|--------------------|
| Total Disbursements | \$10,667.96 |
|----------------------------|--------------------|

Invoice #: 20416

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March

| Date | Description | Hours | Amount | Lawyer |
|-----------|---|-------|--------|--------|
| MATTER: | 4715-001 | | | |
| RE: | SPV Avoidance Litigation | | | |
| Jan-01-11 | Avoidance Action Litigation; draft co-issuer discovery | 0.40 | 100.00 | AHC |
| Jan-02-11 | Avoidance Action Litigation; Work on Pyxis memo | 0.50 | 247.50 | MCL |
| Jan-03-11 | Avoidance Action Litigation; Multiple emails to/from JDG; O/c JDG re: alleged problems with service of original monthly invoice | 1.30 | 715.00 | JNL |
| | Avoidance Action Litigation; Review co-issuer discovery, o/c w/AMB re: same | 0.60 | 330.00 | WFD |
| | Avoidance Action Litigation; Attn to strategy on issuer service, review AMB memo | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; O/c w/AHC re: assignments re: discovery | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; T/c w/JNL re: timing of motion re: time to serve Answer | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Research and email to WFD re: timing of motion re: time to serve Answer | 0.80 | 316.00 | AMB |
| | Avoidance Action Litigation; Emails to/from WFD re: Hague Convention re: service of foreign noteholders | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Research re: Hague Convention issues and prep of long email to team re: same | 2.20 | 869.00 | AMB |
| | Avoidance Action Litigation; O/c w/MCL re: discovery issues | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; O/c w/WFD re: discovery issues | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Numerous o/cs w/MPB re: assignments re: discovery | 0.30 | 118.50 | AMB |
| | Case Administration; Prepared correspondence to feinberg's office re how to serve invoices now that Feinberg has resigned from fee committee | 0.20 | 70.00 | JDG |
| | Case Administration; Emails and calls back and forth with feinberg's office re how to serve invoices now | 0.50 | 175.00 | JDG |
| | Avoidance Action Litigation; o/cs w/AMB, MM re: discovery | 0.30 | 75.00 | AHC |
| | Case Administration; Make copies of Amended Summons and Amended Complaint and send to 38 recipients via certified mail, return receipt requested, including trip to late-closing post office; proof and edit doc per AMB; save docs to system; print Citibank | 8.50 | 935.00 | MEB |

Invoice #: 20416

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March

| | | | | |
|-----------|---|------|--------|-----|
| | production docs sent to us as TIFF file; scan and save same same on system as PDF | | | |
| | Case Administration; Edit doc requests and depo notices for various defendants in class action | 4.80 | 528.00 | MM |
| Jan-04-11 | Avoidance Action Litigation; Review AMB's email summarizing options for service of process on Cayman Issuers and brief o/c w/MCL re: related issues | 0.30 | 165.00 | RRR |
| | Avoidance Action Litigation; Meet w/WFD, MCL, AMB, AHC re: procedural options for service of process and discovery upon Cayman Issuers, next steps, timing | 0.70 | 385.00 | RRR |
| | Avoidance Action Litigation; T/c to Maples & Calder (w/AMB) re: acceptance of service of process upon Cayman Issuers | 0.30 | 165.00 | RRR |
| | Avoidance Action Litigation; T/c w/CIBC's counsel re: requested acceptance of service of process upon CIBC | 0.10 | 55.00 | RRR |
| | Avoidance Action Litigation; Review and respond to multiple emails from JDG re: lost monthly invoice for October bill and confirmation it is to be paid shortly | 1.00 | 550.00 | JNL |
| | Avoidance Action Litigation; O/c w/team re: Issuer services issues, options | 0.70 | 385.00 | WFD |
| | Avoidance Action Litigation; Follow up o/c w/AMB | 0.20 | 110.00 | WFD |
| | Avoidance Action Litigation; Review AMB memo | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Revise memo re: service of process under the Hague Convention | 1.30 | 513.50 | AMB |
| | Avoidance Action Litigation; O/c w/AHC re: co-issuer discovery | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Prep of Co-Issuer discovery | 1.60 | 632.00 | AMB |
| | Avoidance Action Litigation; Prep of email to L. McMurray re: status update re: service of process and discovery | 1.80 | 711.00 | AMB |
| | Avoidance Action Litigation; Long t/c w/RRR and M. Crawford of Maples & Calder re: accepting service for Issuers | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; Long o/c w/WFD, RRR, MCL and AHC re: discovery update | 0.70 | 276.50 | AMB |
| | Avoidance Action Litigation; Conduct legal research re: timing to file motion | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; T/c w/RRR, S. Collings (left v/m) | 0.10 | 49.50 | MCL |
| | Avoidance Action Litigation; T/c w/RRR, B. Trust (left v/m) | 0.10 | 49.50 | MCL |

| Invoice #: | 20416 | Page | 5 | March |
|------------|--|------|--------|-------|
| | Avoidance Action Litigation; O/c w/RRR, WFD, AMB re: discovery and service next steps | 0.50 | 247.50 | MCL |
| | Avoidance Action Litigation; O/c w/RRR re: to do list | 0.10 | 49.50 | MCL |
| | Fee/Employment Applications; Calls with Feinberg's office re changes as to fee committee and invoice procedures | 1.10 | 385.00 | JDG |
| | Case Administration; Review of all email correspondence to Feinberg's office re changes as to fee committee and invoices procedures | 0.10 | 35.00 | JDG |
| | Case Administration; Review of confirmations of delivery of monthly invoices to all Notice Parties at request of Debtors' lead counsel at Weil | 0.10 | 35.00 | JDG |
| | Case Administration; Prepared email correspondences to Debtors' lead counsel at Weil re confirmations of delivery of monthly invoices to all Notice Parties at request of Weil | 0.10 | 35.00 | JDG |
| | Avoidance Action Litigation; meeting w/RRR, WFD, MCL, AMB re: discovery | 0.70 | 175.00 | AHC |
| | Avoidance Action Litigation; review status update email to L. McMurray | 0.30 | 75.00 | AHC |
| | Case Administration; Prep Affidavit of Service for docs served on 12/30/10 and 1/4/11, including service list; proof and edit email | 1.30 | 143.00 | MEB |
| | Avoidance Action Litigation; Review voluminous returned discovery and pleadings from CT Corp, update discovery chart re: same, label and file same and send email to AMB, AHC and MEB re: same | 2.10 | 252.00 | KLS |
| Jan-05-11 | Avoidance Action Litigation; Review lengthy email from WFD to McMurray re: status of discovery issues and options for next steps | 0.20 | 119.00 | WAM |
| | Avoidance Action Litigation; T/c w/Mayer Brown re: consenting to accepting service of process for CIBC; emails w/team re: same | 0.10 | 55.00 | RRR |
| | Avoidance Action Litigation; T/c w/S. Collings re: stay duration/statute of limitations issues; email to team re: same | 0.40 | 220.00 | RRR |
| | Avoidance Action Litigation; O/c w/AB; send materials on service of defendant class | 0.20 | 110.00 | VTC |
| | Avoidance Action Litigation; Review/revise memo re: service status (2x) | 0.50 | 275.00 | WFD |
| | Avoidance Action Litigation; O/c w/AMB | 0.20 | 110.00 | WFD |
| | Avoidance Action Litigation; Emails w/client | 0.10 | 55.00 | WFD |
| | Avoidance Action Litigation; O/c w/RRR | 0.10 | 55.00 | WFD |
| | Avoidance Action Litigation; O/c w/WFD re: email to L.McMurray re: update re: discovery | 0.10 | 39.50 | AMB |

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| | Avoidance Action Litigation; Review Colorado case re: class action service of process and conduct legal research | 1.90 | 750.50 | AMB |
| | Avoidance Action Litigation; O/c w/KD re: finalizing co-issuer discovery | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Revise discovery for co-issuers | 4.40 | 1,738.00 | AMB |
| | Avoidance Action Litigation; Email to/from MCL and WFD re: letter to CIBC re: service of process | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Prep of cover letter to CIBC re: accepting service | 0.70 | 276.50 | AMB |
| | Avoidance Action Litigation; Review email from RRR, WFD, and MCL re: CIBC's counsel accepting service of process | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Revise email to L. McMurray re: discovery update | 0.70 | 276.50 | AMB |
| | Avoidance Action Litigation; o/cs w/AMB, MM re: discovery | 0.20 | 50.00 | AHC |
| | Avoidance Action Litigation; O/c and emails w/RRR re: CT Corp letters filed w/Bankruptcy Court re: return of service for various entities of the Amended Summons and Complaint | 0.10 | 12.00 | KLS |
| | Avoidance Action Litigation; Compare return document letters received directly from CT Corp with those filed with the Court and send email to team re: same | 0.30 | 36.00 | KLS |
| | Case Administration; Revise schedules for co-issuers doc requests and notices of depos; write cover letter to opposing counsel | 1.50 | 165.00 | MM |
| Jan-06-11 | Avoidance Action Litigation; Review email from McMurray re: SPV service and discovery | 0.10 | 59.50 | WAM |
| | Avoidance Action Litigation; O/c w/AMB and WFD re: stay duration and related statute of limitations issue, next steps | 0.40 | 220.00 | RRR |
| | Avoidance Action Litigation; Attn to letter to Mayer Brown re: service process upon CIBC; emails w/B. Trust re: same | 0.10 | 55.00 | RRR |
| | Avoidance Action Litigation; Review new objection to motion for ADR | 0.30 | 165.00 | JNL |
| | Avoidance Action Litigation; Emails from WFD and WAM re: overseas service company and issues regarding retention | 0.50 | 275.00 | JNL |
| | Avoidance Action Litigation; O/c w/AMB re: issuer discovery | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; O/c w/RRR and AMB | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Finalize co-issuer and issuer discovery | 0.60 | 330.00 | WFD |

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| Avoidance Action Litigation; O/c w/CGP re: assignments | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; Finalize co-issuer discovery | 3.50 | 1,382.50 | AMB | |
| Avoidance Action Litigation; Revise service list | 2.00 | 790.00 | AMB | |
| Avoidance Action Litigation; Prep of long cover letter re: co-issuer discovery | 0.50 | 197.50 | AMB | |
| Avoidance Action Litigation; Emails and calls to Epiq re: service | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review email from RRR to B. Trust re: accepting service; coordinate serving CIBC | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; O/c and emails to/from KS re: whether LLS is approved ordinary course professional | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Emails to/from WFD re: whether LLS is approved ordinary course professional | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review email from RRR to Team re: t/c w/S. Collings | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review emails from L. McMurray and WFD re: service of process | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Revise letter to CIBC re: accepting service of process | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; investigate the registered agents of U.S. noteholder defendants named in the Complaint, including by review of multiple state corporation registries; draft chart summarizing findings | 6.20 | 1,550.00 | CGP | |
| Avoidance Action Litigation; begin to draft DTC participant discovery | 0.70 | 175.00 | AHC | |
| Case Administration; Revise Co-Issuer document request and deposition notice PDFs via Adobe software to include necessary signature pages and schedules; convert word versions of Co-Issuer document requests and deposition notices to PDFs where necessary | 2.20 | 242.00 | MEB | |
| Avoidance Action Litigation; Edits to Requests and Notices to Co-Issuers, print all, scan and save sig. pages | 3.00 | 330.00 | KJD | |
| Avoidance Action Litigation; T/c w/AMB re: assignments, review "Ordinary Course of Business" filings for mention of Legal Language Services and email to AMB re: same | 0.50 | 60.00 | KLS | |
| Avoidance Action Litigation; Download new "Ordinary Course of Business" filings filed since I last saved them and save same on the system | 0.10 | 12.00 | KLS | |

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| Jan-07-11 | Avoidance Action Litigation; Review recent emails re: discovery status and next steps | 0.10 | 59.50 | WAM |
| | Avoidance Action Litigation; O/c w/WFD to review next steps re: Issuer service and place to call to L. McMurray re: same | 0.10 | 55.00 | RRR |
| | Avoidance Action Litigation; Review additional objections to ADR procedures motion | 1.00 | 550.00 | JNL |
| | Avoidance Action Litigation; O/c w/AMB re: status | 0.60 | 330.00 | WFD |
| | Avoidance Action Litigation; O/c w/RRR including call to client | 0.20 | 110.00 | WFD |
| | Avoidance Action Litigation; Review docs produced by trustees | 0.20 | 110.00 | WFD |
| | Avoidance Action Litigation; Review emails from WFD and MCL re: whether Reed Smith accepted service for BNY Trust (UK) office | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Update electronic service list | 0.40 | 158.00 | AMB |
| | Avoidance Action Litigation; Proof cover letter to Co-Issuers | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Proof co-issuer discovery | 0.70 | 276.50 | AMB |
| | Avoidance Action Litigation; Email co-issuer discovery to EPIQ for service | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; O/c w/WFD re: next steps of discovery | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; Calls w/LLS re: service of process on Issuers | 1.60 | 632.00 | AMB |
| | Avoidance Action Litigation; Emails and t/cs w/A. Bowdler re: service of process on issuers | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Review email from I. deVyver and MCL re: confirming depos were postponed | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Email to C. Fallon re: affidavit of service | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review bid letter from LLS | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Review letter from MCL to I. deVyver re: accepting service of process for UK entity | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Draft, revise and sent cover letter to I. deVyver re: Reed Smith accepting service on behalf of BNY Corporate Trustee Services Ltd | 0.50 | 247.50 | MCL |
| | Avoidance Action Litigation; Email exchange w/I. deVyver re: BNY depos | 0.20 | 99.00 | MCL |
| | Avoidance Action Litigation; Email exchange w/WFD, AMB re: cover letter to I. deVyver | 0.20 | 99.00 | MCL |

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| Jan-10-11 | Avoidance Action Litigation; draft chart of information re: registered agents of U.S. Issuer defendants named in the Complaint; o/c w/AMB re: same; revise same per AMB's comments | 1.70 | 425.00 | CGP |
| | Avoidance Action Litigation; t/c w/AMB and Legal Language Services re: service of process on U.S. Issuer defendants | 0.40 | 100.00 | CGP |
| | Avoidance Action Litigation; o/cs w/AMB re: next steps | 0.20 | 50.00 | AHC |
| | Avoidance Action Litigation; hand delivery of Summons and Notice to Meyer | 0.90 | 99.00 | KJD |
| | Avoidance Action Litigation; Make WFD edits to correspondence | 0.80 | 88.00 | KJD |
| | Avoidance Action Litigation; Scan co-issuer discovery | 0.20 | 22.00 | AJA |
| | Avoidance Action Litigation; Create redwelds | 0.10 | 11.00 | AJA |
| | Avoidance Action Litigation; Emails to/from WFD re: language translation service for Hague Service requirements | 0.20 | 119.00 | WAM |
| | Avoidance Action Litigation; O/c w/AMB re: status | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Attn to LLS retention | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; T/c w/JNL re: LLS | 0.20 | 110.00 | WFD |
| | Avoidance Action Litigation; Revise letter to Creditors' Committee re: discovery | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Email team a copy of DTC's production | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review email from MCL and WFD re: DTC's production | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review email from WFD and WAM re: paying for LLS | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; O/c w/CGP re: US noteholders and assignment re: Wells Fargo | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Email to/from MCL re: Quartz Deal | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; O/c w/CGP re: service of process of Noteholders | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; O/c w/WFD and AHC re: review of Trustees docs and DTC's production | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Long o/c w/AHC re: review of Trustee docs and review of DTC's production | 1.20 | 474.00 | AMB |

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| | Avoidance Action Litigation; Update discovery spreadsheet | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; O/c w/AHC re: next steps re: discovery | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Review DTC's production, o/c w/KD re: same | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Revise aff of Service re: CIBC and coordinate filing | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Email same to E. Winston | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Email exchange w/H. Jun, A. Elliott re: SPV deals | 0.20 | 99.00 | MCL |
| | Avoidance Action Litigation; Email exchanges re: DTC production | 0.20 | 99.00 | MCL |
| | Avoidance Action Litigation; Draft entity name comparison chart for Issuer defendants based on investigation of state corporation registries | 1.40 | 350.00 | CGP |
| | Avoidance Action Litigation; e-file affidavits of service of pleadings | 0.30 | 75.00 | AHC |
| | Avoidance Action Litigation; draft Noteholder discovery | 1.00 | 250.00 | AHC |
| | Avoidance Action Litigation; Meeting w/AMB re: analysis of discovery by Trustees | 1.20 | 300.00 | AHC |
| | Avoidance Action Litigation; analyze Trustee discovery and create seummary of same | 3.00 | 750.00 | AHC |
| | Case Administration; Make copies of Amended Summons and Amended Complaint and clip; proof and edit letter from AMB to E. Winston; scan and save same to system, and send via First-Class mail w/enclosures; compare Issuers' lists to account for discrepancy in number of Issuers | 1.20 | 132.00 | MEB |
| | Avoidance Action Litigation; Scan and save DTCC docs to system | 0.30 | 33.00 | KJD |
| Jan-11-11 | Avoidance Action Litigation; Review recent emails re: discovery issues | 0.10 | 59.50 | WAM |
| | Case Administration; Mtg w/AHC re: Pebble Creek discovery | 0.60 | 330.00 | SCB |
| | Avoidance Action Litigation; Attn to LLS vendor issues | 0.60 | 330.00 | WFD |
| | Avoidance Action Litigation; Emails w/AMB re: service status, follow up | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; Attn to schedule status, strategy | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; Draft email to A. Rovira re: discovery | 0.30 | 118.50 | AMB |

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| | Avoidance Action Litigation; Emails to/from WFD and AHC re: getting LLS to change its bid letter | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review emails from WFD and JNL re: being able to use LLS as a vendor | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Email to/from WFD and CGP re: service of US based noteholders | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Email to WFD re: update re: discovery | 1.00 | 395.00 | AMB |
| | Avoidance Action Litigation; T/cs w/S. Singh, S. Collings and A. Scarpa at Weil re: address information for Wells Fargo Bank, National Association | 0.30 | 75.00 | CGP |
| | Avoidance Action Litigation; Draft email to AMB re: t/c w/S. Singh, S. Collings and A. Scarpa | 0.20 | 50.00 | CGP |
| | Avoidance Action Litigation; continue to review Trustee discovery and summarize same in spreadsheet | 4.00 | 1,000.00 | AHC |
| | Avoidance Action Litigation; o/cs w/MEB re: analysis of DTC discovery | 0.20 | 50.00 | AHC |
| | Case Administration; Proof and edit email; prep spreadsheet per AHC | 2.50 | 275.00 | MEB |
| Jan-12-11 | Avoidance Action Litigation; Begin prep of monthly invoice for December time | 0.50 | 275.00 | JNL |
| | Avoidance Action Litigation; Attn to finalizing LLS agmt | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; Communications w/WGM re: same | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Attn to status of discovery from Trustees | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Emails to/from AHC re: C. Laforge re: revising bid | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review BNY's responses and objections | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Review DB's doc production | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Review emails from I. deVyver re: doc production | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Review email from WFD to S. Collings re: service of process in the Caymen Islands and selection of vendor | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Emails to/from AHC and WFD re: proper signature block for L. McMurray re: LLS bid letter | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review revised bid letter | 0.20 | 79.00 | AMB |

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| | Avoidance Action Litigation; Email to/from CGP re: coordinating service of process on US based Noteholders | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Email to/from AHC re: review of DTC discovery | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Email to/from AHC re: review of Trustee discovery | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Email exchange w/I. deVyver re: acceptance of service | 0.20 | 99.00 | MCL |
| | Avoidance Action Litigation; Review BNY and DB discovery responses | 0.80 | 396.00 | MCL |
| | Avoidance Action Litigation: research proper addresses of U.S. noteholder defendants for service of the Amended Summons and Complaint | 1.30 | 325.00 | CGP |
| | Case Administration; Review and analysis of emails to from co-counsel re whether LLS can be retained for service as an ordinary course professional | 0.20 | 70.00 | JDG |
| | Case Administration; Review and analysis of motion and order for omnibus objection to claims procedures and relevant docket entries | 0.50 | 175.00 | JDG |
| | Avoidance Action Litigation; obtain signed bid letter from Legal Language Services and numerous calls and emails w/WFD, AMB, LLS re: same | 0.50 | 125.00 | AHC |
| | Avoidance Action Litigation; update discovery spreadsheet w/Trustee productions | 0.50 | 125.00 | AHC |
| | Avoidance Action Litigation; o/c w/AMB re: discovery spreadsheet | 0.10 | 25.00 | AHC |
| | Case Administration; Continue prep of spreadsheet; look up entity info on New York, Delaware and Minnesota Department of State websites | 2.70 | 297.00 | MEB |
| Jan-13-11 | Avoidance Action Litigation: Review recent order re: derivatives and emails to/from MCL and WMD team re: same | 0.20 | 119.00 | WAM |
| | Avoidance Action Litigation; Emails to/from MCL and AHC re: UBS; review email from MCL re: "Summary" chart and adjourning DB Depo; emails to/from CGP re: serving Wells Fargo | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Review spreadsheet summarizing DTC production; t/c w/AHC re: same | 0.40 | 198.00 | MCL |
| | Avoidance Action Litigation; Email exchange and t/c w/R. Pedone re: depo scheduling; email exchange w/WFD re: same | 0.50 | 247.50 | MCL |
| | Avoidance Action Litigation; Review and summarize 5th Supplemental Order Re: | 0.50 | 247.50 | MCL |

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| Termination and Settlement of Derivative Contracts | | | | |
|--|--|------|----------|-----|
| | Avoidance Action Litigation: research proper addresses of U.S. noteholder defendants for service of the Amended Summons and Complaint; facilitate preparation of service packages for U.S. noteholder defendants identified as having reliable addresses; review Schedule 2 to Amended Complaint and identify foreign noteholder defendants | 1.20 | 300.00 | CGP |
| | Avoidance Action Litigation; o/cs w/MCL, MEB re: DTC discovery and additional lists | 0.20 | 50.00 | AHC |
| | Avoidance Action Litigation; email DTC discovery to team | 0.10 | 25.00 | AHC |
| | Case Administration; Prep additional Excel worksheets containing codes that were not found, and all DTC participants, and add to Summary of Information Provided by DTC Excel workbook; print First Amended Summons and First Amended Complaint and clip; prep WMD labels for noteholders that have registered agents; prep certified mail labels and return receipt cards | 4.20 | 462.00 | MEB |
| Jan-14-11 | Avoidance Action Litigation; Review emails among team, client, Weil re: engaging LLS for assistance w/service of process abroad | 0.10 | 55.00 | RRR |
| | Case Administration; Review multiple emails from WFD re: overseas process server | 0.50 | 275.00 | JNL |
| | Avoidance Action Litigation; Attn to methods of Cayman/other foreign service | 0.80 | 440.00 | WFD |
| | Avoidance Action Litigation; Review emails from WFD and MCL re: DTC's production | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review Citibank and BoA discovery and revise charts re: same w/AHC | 3.60 | 1,422.00 | AMB |
| | Avoidance Action Litigation; Emails to/from M. Breen and WFD re: response from Pebble Creek LCDO 2007-2, LTD | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Review emails from MCL and WFD re: DTC's production | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review email from S. Collings re: locating Solicitor to effect service on Issuers in the Cayman Islands | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; T/c w/LLS re: service of Issuers in the Cayman Islands | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; T/c w/S. Collings re: service of issuers in Cayman Islands | 0.60 | 237.00 | AMB |

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| Jan-17-11 | Avoidance Action Litigation; Review email from S. Collings re: service of Issuers in the Cayman Islands | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; O/cs w/CGP, PRW and MEB re: serving US based noteholders | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; O/cs w/MEB re: serving additional co-issuer | 0.40 | 158.00 | AMB |
| | Avoidance Action Litigation; Review correspondence from CSC re: inability to accept service for ALT CDO SPC | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; T/c w/L. Elbaum re: DTC production | 0.30 | 148.50 | MCL |
| | Avoidance Action Litigation; Internal email exchange re: DTC production | 0.10 | 49.50 | MCL |
| | Avoidance Action Litigation; O/c w/AMB re: service on U.S. noteholder defendants and verifying corporate entity name and registered address information for each such defendant; research re: same | 0.50 | 125.00 | CGP |
| | Avoidance Action Litigation; discussions w/AMB re: discovery spreadsheet | 2.00 | 500.00 | AHC |
| | Avoidance Action Litigation; research on service of entities through NY Department of State | 0.20 | 50.00 | AHC |
| | Case Administration; Continue prep of certified mail labels and return receipt cards; t/cs w/DLS re: serving of entities through New York Department of State; assemble all and trip to post office to send summons and complaint by First-Class and certified mail | 3.50 | 385.00 | MEB |
| Jan-18-11 | Avoidance Action Litigation; Review Affidavit of Service and email to Epiq | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Numerous emails to/from WFD, MCL and SCB re: call re: serving Cayman Island Defendants | 1.10 | 434.50 | AMB |
| | Avoidance Action Litigation; Prep of email to LLS re: foreign defendants | 0.70 | 276.50 | AMB |
| | Avoidance Action Litigation; Edits to DTC participant discovery | 0.50 | 125.00 | AHC |
| | Avoidance Action Litigation; review and update spreadsheet with information from Deutsche Bank's production | 1.00 | 250.00 | AHC |
| | Avoidance Action Litigation; Attn to team email re: service of process issues | 0.10 | 55.00 | RRR |
| | Avoidance Action Litigation; T/cs w/SO, AMB re: services issues | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; Emails w/client, WGM | 0.40 | 220.00 | WFD |

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| | Avoidance Action Litigation; Attn to Noteholder discovery | 0.70 | 385.00 | WFD |
| | Avoidance Action Litigation; T/c w/A. Schwartz service in Cayman Islands | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Prep of noteholder discovery | 0.70 | 276.50 | AMB |
| | Avoidance Action Litigation; Review emails from WFD, L. McMurray and S. Collings re: service of process on Cayman Islands Issuer | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Review emails from LLS re: new bid on foreign noteholders | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; Review DB discovery | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; T/cs w/LLS and o/cs w/WFD re: service of process on Cayman issuers | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; T/c w/S. Collings and WFD re: service of Issuers | 0.30 | 118.50 | AMB |
| | Avoidance Action Litigation; O/cs w/WFD re: next steps | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review emails from Pyxis counsel and MCL re: discovery responses | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; O/c and t/c w/MCL and Pyxis counsel re: discovery responses | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; T/c w/Phillip Anderson and C. Laforgue re: Service of Process of foreign noteholders | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; T/c w/M. Breen (Schulte) re: Pebble Creek response to discovery request; sent email confirming agmt re: same | 0.30 | 148.50 | MCL |
| | Case Administration; Verify that docs have been saved on system; send 78 copies of Amended Summons and Amended Complaint to P. Anderson via Federal Express; prep cover letter to P. Anderson re: serving of Amended Summons and Amended Complaint upon Cayman Island entities | 1.00 | 110.00 | MEB |
| Jan-19-11 | Case Administration; Review docs re: service of process on Taiwan and Australian note holders | 2.00 | 1,100.00 | SCB |
| | Avoidance Action Litigation; Team mtg re: status, next steps re: discovery efforts, timing, related service of process issues | 1.30 | 715.00 | RRR |
| | Avoidance Action Litigation; Review and respond to emails from JDG re: invoice issues | 0.30 | 165.00 | JNL |
| | Avoidance Action Litigation; Attn to LLS Cayman status | 0.20 | 110.00 | WFD |

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|--|-------|--------|-----|-------|
| Avoidance Action Litigation; Mtg w/team re: status/strategy on all service/review of discovery | 1.20 | 660.00 | WFD | |
| Avoidance Action Litigation; Attn to LLS agmt/service issues for non-Cayman countries | 0.90 | 495.00 | WFD | |
| Avoidance Action Litigation; Attn to Note Holder issues | 1.20 | 660.00 | WFD | |
| Avoidance Action Litigation; T/c w/P. Anderson from LLS re: service of Issuers in Cayman Islands | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; Prep DTC Participant discovery | 1.30 | 513.50 | AMB | |
| Avoidance Action Litigation; Review email from WFD to L. McMurray re: service of process on foreign based Noteholders | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; T/cs and emails to/from P. Anderson from LLS re: revising bid letter for service of non-US based noteholder | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; O/c w/MCL re: questions for DTC re: production | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; Review docs for information re: CIBC | 0.50 | 197.50 | AMB | |
| Avoidance Action Litigation; Forward L. McMurray's email signed contract to LLS | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; O/c w/CGP re: spreadsheet of US based noteholder names and emails to/from CGP re: basis for names | 0.50 | 197.50 | AMB | |
| Avoidance Action Litigation; Conduct research, o/cs w/SCP, o/cs w/WFD re: value of foreign noteholders | 1.50 | 592.50 | AMB | |
| Avoidance Action Litigation; Long o/c w/WFD, RRR, MCL, AHC and CGP re: next steps re: discovery | 1.70 | 671.50 | AMB | |
| Avoidance Action Litigation; Review Deutsche Banks' production | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; O/c w/KD re: assignments | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Emails to/from P. Anderson re: W-9 and federal express code | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Emails from L. McMurray and WFD re: W-9 | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; O/c w/RRR re: CIBC | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; O/c w/AHC re: DTC participant discovery | 0.30 | 148.50 | MCL | |
| Avoidance Action Litigation; O/c w/team re: service and discovery issues | 1.60 | 792.00 | MCL | |
| Avoidance Action Litigation; O/c w/AMB re: follow questions for DTC | 0.40 | 198.00 | MCL | |

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|-----------|--|------|----------|-----|
| | Avoidance Action Litigation: O/c w/WFD, RRR, AMB and AHC re: progress of service of process, discovery and subpoenas; revise draft chart of U.S. Noteholder Defendants and their addresses for discussion during o/c; draft entity name comparison table for WFD by review of docs forwarded by AMB, including the Comprehensive Managed CDO Investor List, Pebble Creek LCDO 2007-2, Ltd., noteholder list and the PYXIX 2001-1 noteholder list from client; incorporate information re: noteholder defendants denying noteholder status into table for WFD | 3.20 | 800.00 | CGP |
| | Avoidance Action Litigation; meeting w/team re: discovery | 1.50 | 375.00 | AHC |
| | Avoidance Action Litigation; create schedules | 3.50 | 875.00 | AHC |
| | Case Administration; Prep Affidavit of Service for serving Amended Summons and Amended Complaint via First-Class and certified mail on 1/14/11; scan and save on system | 0.30 | 33.00 | MEB |
| | Case Administration; Print copies of Amended Subpoena/Complaint | 1.20 | 132.00 | KJD |
| Jan-20-11 | Avoidance Action Litigation: T/c w/RRR re: status and next steps | 0.20 | 119.00 | WAM |
| | Avoidance Action Litigation: O/c w/WFD re: status, next steps and staffing | 0.20 | 119.00 | WAM |
| | Avoidance Action Litigation: Review WFD email to McMurray re: status | 0.10 | 59.50 | WAM |
| | Case Administration; Various confs w/AMB, AHC re: DTC discovery | 0.30 | 165.00 | SCB |
| | Avoidance Action Litigation; T/c w/WAM re: discovery status, next steps, next steps, timing issues, staffing | 0.20 | 110.00 | RRR |
| | Avoidance Action Litigation; Attn to mis-named Note Holder issues | 0.70 | 385.00 | WFD |
| | Avoidance Action Litigation; Review draft participant discovery; o/c w/AMB re: same | 0.90 | 495.00 | WFD |
| | Avoidance Action Litigation; Conduct legal research re: service of subpoena on foreign banks | 4.20 | 1,659.00 | AMB |
| | Avoidance Action Litigation; Review emails from MCL re: conversations w/DTC's counsel re: participant codes | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Review email from WFD to L. McMurray re: identities of US based noteholders | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Emails to/from LLS re: wire for service of Cayman Islands Defendants | 0.10 | 39.50 | AMB |

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| | Avoidance Action Litigation; O/cs w/WFD, MCL, SMP, CGP and AHC re: various service issues | 3.00 | 1,185.00 | AMB |
| | Avoidance Action Litigation; Review and comment on DTC participant subpoena | 0.30 | 148.50 | MCL |
| | Avoidance Action Litigation; O/cs w/AMB re: discovery | 0.40 | 198.00 | MCL |
| | Avoidance Action Litigation; T/c and email exchanges w/L. Elbaum re: DTC discovery | 0.50 | 247.50 | MCL |
| | Avoidance Action Litigation; O/c w/ASB re: research assignment re: method of service of subpoena on National Bank and/or branch | 0.30 | 127.50 | SMP |
| | Avoidance Action Litigation; Legal research re: method of service of subpoena on National Bank and/or branch | 4.00 | 1,700.00 | SMP |
| | Avoidance Action Litigation; Revise entity name comparison table per WFD's comments; research proper database for looking up entity information on National Associations; facilitate research of entity address information for participants by AJA; review AJA compilation | 2.40 | 600.00 | CGP |
| | Case Administration; Review of email correspondence from Debtors | 0.10 | 35.00 | JDG |
| | Case Administration; Review of email from WM re email correspondence from Debtors received today; | 0.10 | 35.00 | JDG |
| | Case Administration; Prepared email correspondence to Debtors in reply | 0.10 | 35.00 | JDG |
| | Case Administration; Prep cover letter to P. Anderson and send him 54 copies of Amended Summons and Amended Complaint via Federal Express; proof and edit Schedules to Subpoena in an Adversary Proceeding | 0.80 | 88.00 | MEB |
| Jan-21-11 | Avoidance Action Litigation; Review recent emails re: discovery and obtaining additional information | 0.20 | 119.00 | WAM |
| | Case Administration; Conf re: DTC discovery | 0.30 | 165.00 | SCB |
| | Case Administration; T/cs AB re: service issues on National Banking Assoc./research service issue | 0.80 | 440.00 | JNL |
| | Avoidance Action Litigation; Attn to Issuer service | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Attn to foreign noteholder service issues, emails w/client | 0.50 | 275.00 | WFD |
| | Avoidance Action Litigation; O/c w/AMB, AHC re: noteholder subpoenas | 0.70 | 385.00 | WFD |
| | Avoidance Action Litigation; O/c w/MCL, AMB re: GS issues | 0.30 | 165.00 | WFD |

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| Avoidance Action Litigation; O/cs w/AHC and WFD re: formatting of schedules for DTC Participant subpoenas | 1.20 | 474.00 | AMB | |
| Avoidance Action Litigation; Review emails from L. McMurray and WFD re: agmt to pay LLS for Service of Foreign entities | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review cover letter from Citibank's counsel re: additional production | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Emails and o/cs w/WFD and CGP re: foreign noteholders | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; Review AHC's research re: Superintendent of Banks | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Emails and o/cs w/MCL re: follow-up questions w/DTC | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; Review email from AHC re: financial institutions | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review emails from H. Ju and WFD re: obtaining information on US Noteholders | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Email to/from WFD re: addresses for foreign noteholders | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; Long o/cs w/SP and CGP re: location to serve big bank DTC Participants | 1.70 | 671.50 | AMB | |
| Avoidance Action Litigation; O/c w/WFD re: DTC participant subpoenas | 0.30 | 148.50 | MCL | |
| Avoidance Action Litigation; Internal emails re: discovery | 0.40 | 198.00 | MCL | |
| Avoidance Action Litigation; Email exchange w/L. Elbaum re: DTC discovery | 0.30 | 148.50 | MCL | |
| Avoidance Action Litigation; Continue legal and internet research re: service of subpoena on National Bank and/or branch | 2.00 | 850.00 | SMP | |
| Avoidance Action Litigation; Legal research re: calculation of witness fees in event of service of subpoena on secretary of state and/or registered agent | 0.80 | 340.00 | SMP | |
| Avoidance Action Litigation; O/c w/ASB and CGP re: findings and course of action for service of subpoena | 0.50 | 212.50 | SMP | |
| Avoidance Action Litigation; O/c w/AMB re: obtaining certain DTC Participant registered agent information; draft chart re: same; facilitate draft of chart re: foreign noteholders whose addresses LLS could not confirm | 2.10 | 525.00 | CGP | |
| Avoidance Action Litigation; research on service of discovery for DTC participants and draft discovery and schedules for same | 5.50 | 1,375.00 | AHC | |

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| | Avoidance Action Litigation; o/cs w/WFD, AMB re: DTC participant discovery | 0.20 | 50.00 | AHC |
| | Avoidance Action Litigation; Create doc | 0.50 | 55.00 | AJA |
| | Avoidance Action Litigation: Update summary chart re: info produced by DTC w/information received from Proskauer, save same on the system and email same to AHC per her request | 0.70 | 84.00 | KLS |
| Jan-22-11 | Avoidance Action Litigation: Draft chart re: DTC Participant registered agent information | 2.80 | 700.00 | CGP |
| Jan-23-11 | Case Administration; Research contacts of DTC participants | 4.80 | 528.00 | AJA |
| Jan-24-11 | Case Administration; Conf w/AMB re: Citibank discovery | 0.30 | 165.00 | SCB |
| | Case Administration; Review emails re: possible need for supplemental retention affidavit | 0.40 | 220.00 | JNL |
| | Avoidance Action Litigation; Attn to request for deal information for Note Holders | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Attn to participant subpoenas | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Review status, o/c w/AMB re: all service | 0.60 | 330.00 | WFD |
| | Avoidance Action Litigation O/c w/WFD re status | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation: review Citi's supplemental production | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation: review US Bank's production and o/c w/SCB re: same | 1.80 | 711.00 | AMB |
| | Avoidance Action Litigation: prep of DTC participant discovery | 3.70 | 1,461.50 | AMB |
| | Avoidance Action Litigation: o/c w/ MSF re: creating DTC participant information chart | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation: o/cs w/CGP re: adding transaction to US based noteholder information | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation: review emails from WFD and J. Bizuela re: transactions for each US Based noteholder | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Legal research re: calculation of witness fees in the event of service of subpoena on secretary of state and/or registered agent | 1.00 | 425.00 | SMP |
| | Avoidance Action Litigation; Legal research re: current federal schedule of subpoena mileage fees | 0.50 | 212.50 | SMP |
| | Avoidance Action Litigation; Look up transaction information for each U.S. noteholder defendant for whom we have been | 1.40 | 350.00 | CGP |

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| | unable to find official address or registered agent information | | | |
| | Avoidance Action Litigation; efile affidavit of service of process | 0.30 | 75.00 | AHC |
| | Avoidance Action Litigation; draft DTC participant discovery and create schedules to same | 1.70 | 425.00 | AHC |
| | Case Administration; Scan and save on system US Bank, N.A., US Bank Trust, N.A. and Citibank correspondence, production and other docs; print US Bank, N.A. and US Bank Trust, N.A. docs and flag certain docs; prep AMB working file for same | 1.00 | 110.00 | MEB |
| | Case Administration; Create Spreadsheet of discovery served | 0.70 | 77.00 | MSF |
| | Avoidance Action Litigation; Edit doc | 0.90 | 99.00 | AJA |
| Jan-25-11 | Avoidance Action Litigation; Review email from WFD re: DTC information on Noteholders, and proposed follow-up, and email to WFD re: same | 0.20 | 119.00 | WAM |
| | Case Administration; Conf re: DTC re: discovery | 0.50 | 275.00 | SCB |
| | Avoidance Action Litigation; Review and respond to emails from Brown Greer re: spreadsheet request | 1.00 | 550.00 | JNL |
| | Avoidance Action Litigation; Attn to foreign noteholder service | 0.70 | 385.00 | WFD |
| | Avoidance Action Litigation; Attn to emails w/client re: entity names | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; Prep of conflict email re; DTC participant subpoenas | 0.60 | 237.00 | AMB |
| | Avoidance Action Litigation; Emails to/from WFD re: LLS's wire information | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Prep of DTC participant discovery | 1.50 | 592.50 | AMB |
| | Avoidance Action Litigation; Prep of chart w/additional foreign noteholder information | 1.30 | 513.50 | AMB |
| | Avoidance Action Litigation; Numerous emails to/from P. Anderson re: service of Cayman Islands entities and other foreign country entities | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; T/cs w/LLS re: adding entity and dissolved entity in Cayman Islands | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; Prep and revise draft notices of subpoena to non-parties | 1.50 | 637.50 | SMP |
| | Avoidance Action Litigation; Review complaint | 1.00 | 425.00 | SMP |

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| | Avoidance Action Litigation; obtain transaction and registered entity name information for certain U.S. noteholders; o/cs w/AMB re: same; draft entity name comparison chart summarizing same | 3.20 | 800.00 | CGP |
| | Avoidance Action Litigation; Review of emails and attachments to and from BrownGreer | 0.40 | 140.00 | JDG |
| | Avoidance Action Litigation; Review of latest order regarding procedures for payment of fees re BrownGreer's emails | 0.10 | 35.00 | JDG |
| | Avoidance Action Litigation; Emails to and from NG re Brown Greer's email | 0.30 | 105.00 | JDG |
| | Avoidance Action Litigation; Review of excel spreadsheets requested by BrownGreer | 0.20 | 70.00 | JDG |
| | Avoidance Action Litigation; draft DTC participant discovery | 5.30 | 1,325.00 | AHC |
| | Avoidance Action Litigation; o/cs w/AMB re: discovery | 0.10 | 25.00 | AHC |
| | Avoidance Action Litigation; draft email per AMB request | 0.10 | 25.00 | AHC |
| | Case Administration; Proof and edit letter from AMB to L. Schindel and J. Stumpf; proof and edit email; serve Amended Summons and Amended Complaint upon Delaware Investment Advisors Inc. via First-Class and certified mail, including trip to post office | 1.40 | 154.00 | MEB |
| | Avoidance Action Litigation; Service List excel worksheet updates | 2.50 | 275.00 | KJD |
| | Avoidance Action Litigation; Organize, label and file 13 redwelds of pleadings and discovery docs returned by CT Corp | 0.40 | 48.00 | KLS |
| Jan-26-11 | Avoidance Action Litigation; Review recent emails re: discovery | 0.20 | 119.00 | WAM |
| | Avoidance Action Litigation; T/c w/WFD re: discovery status and next steps | 0.20 | 119.00 | WAM |
| | Avoidance Action Litigation; Emails to/from NG re: conflict issue query | 0.40 | 220.00 | JNL |
| | Avoidance Action Litigation; Attn to emails re: LLS, entity names | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; Review noteholder subpoenas | 0.40 | 220.00 | WFD |
| | Avoidance Action Litigation; O/cs w/AMB | 0.30 | 165.00 | WFD |
| | Avoidance Action Litigation; Emails to/from J. Bialek from Porter Wright re: process server in Ohio | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; Email to EPIQ re: service of Notice of Subpoenas | 0.10 | 39.50 | AMB |

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| Avoidance Action Litigation; O/c w/AHC re: checks for Subpoenas | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; T/c w/S. Collings re: Wells Fargo counsel | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; O/c w/SP re: assignments and locating correct district courts for subpoenas to be issued | 0.50 | 197.50 | AMB | |
| Avoidance Action Litigation; Prep of DTC Participant discovery | 4.50 | 1,777.50 | AMB | |
| Avoidance Action Litigation; Emails to/from WAM and o/c w/WFD re: subpoena for Morgan Stanley | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review emails from MCL and L. Elbaum re: follow-up questions w/DTC | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Email to LLS w/Word versions of Amended Complaint, Amended Summons and Schedules | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review email from P. Anderson re: LLS Status | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review emails from RRR and NG re: conflict check | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Review emails from WFD to L. McMurray and J. Brizuela re: serving Japanese entities and noteholder information | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; T/c and email exchange w/L. Elbaum re: DTC discovery | 0.30 | 148.50 | MCL | |
| Avoidance Action Litigation; Review and revise doc requests for non-party defendants per AMB | 1.00 | 425.00 | SMP | |
| Avoidance Action Litigation; Review draft subpoenas and Federal District court website to determine issuing district for subpoenas per AMB | 2.60 | 1,105.00 | SMP | |
| Avoidance Action Litigation; review information received from Lehman re: noteholder entity names, o/c w/AMB re: same Fee/Employment Applications; Review of email from JNL re fee application issues | 0.40 | 100.00 | CGP | |
| Fee/Employment Applications; Prepare email in response to JNL re fee application issues | 0.10 | 35.00 | JDG | |
| Avoidance Action Litigation; Prepare email to JNL re emails and attachments received from BrownGreer | 0.10 | 35.00 | JDG | |
| Avoidance Action Litigation; locate docs on docket in assistance to AMB | 0.20 | 50.00 | AHC | |
| Avoidance Action Litigation; draft and finalize cover letters for subpoenas; calculate mileage for same; request checks from JM re: same | 0.70 | 175.00 | AHC | |

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| | Case Administration; Prep Affidavit of Service for Amended Summons and Amended Complaint sent to Delaware on 1/25/11; emails to process server re: number of copies of subpoena required when serving and serving docs within time frame required; send letter and enclosures to Wells Fargo Bank, N.A. via First-Class mail, Federal Express and registered mail, including trip to post office; bring subpoenas to be served to process server; scan, save on system, copy and tab subpoenas and notices of subpoena | 5.30 | 583.00 | MEB |
| Jan-27-11 | Avoidance Action Litigation; Hand Delivery to Lehman Holdings | 0.80 | 88.00 | KJD |
| | Avoidance Action Litigation; Review recent emails re: discovery | 0.10 | 59.50 | WAM |
| | Avoidance Action Litigation; Review spreadsheets in response to query from Brown Greer | 1.00 | 550.00 | JNL |
| | Avoidance Action Litigation; Attn to foreign service issues, o/c w/AMB | 0.60 | 330.00 | WFD |
| | Avoidance Action Litigation; Review email from H. Chan re: noteholders for Ruby | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review emails from EPIQ re: incorrect addresses | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review email from Hammerman re: Noteholders | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Email to Epiq re: service of additional subpoenas | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Review emails from SP re: addresses from DLS re: service of subpoenas | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Emails to/from Epiq re: service list, revise service list and t/c w/Epiq re: same | 1.10 | 434.50 | AMB |
| | Avoidance Action Litigation; Review emails between MCL and L. Elbaum re: DTC's production | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Revise Goldman Subpoena | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Review emails to/from WFD and L. McMurray re: signed LLS contract | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Emails to/from P. Anderson from LLS and t/c w/P. Anderson re: service of process | 0.20 | 79.00 | AMB |
| | Avoidance Action Litigation; Internet research re: potential process servers | 0.50 | 212.50 | SMP |
| | Avoidance Action Litigation; t/c w/ DLS re: service of subpoenas | 0.30 | 127.50 | SMP |

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| | Avoidance Action Litigation; o/cs w/AMB re: service of subpoena | 0.20 | 85.00 | SMP |
| | Avoidance Action Litigation; Review of email from Browngreer | 0.10 | 35.00 | JDG |
| | Avoidance Action Litigation; provide DTC counsel w/information per MCL request | 0.20 | 50.00 | AHC |
| | Case Administration; Revise Affidavit of Service for Amended Summons and Amended Complaint sent to Delaware on 1/25/11; email to process server re: serving docs in New Jersey; continue to scan, save on system, copy and tab subpoenas and notices of subpoena; prep cover letters for subpoenas that will be served by process server on 1/28/11; scan and save same on system; bring subpoenas to be served to process server | 2.30 | 253.00 | MEB |
| Jan-28-11 | Case Administration; Continue preparing monthly invoice | 2.50 | 1,375.00 | JNL |
| | Case Administration; Review and respond to multiple emails from WFD and JDG re: service validity on PO Bo | 0.60 | 330.00 | JNL |
| | Avoidance Action Litigation; o/c w/AMB re: foreign service | 0.70 | 385.00 | WFD |
| | Avoidance Action Litigation; O/c w/AMB and CGP re: entity names for service | 1.00 | 550.00 | WFD |
| | Avoidance Action Litigation; Attn to strategy on all service/amending/motion | 1.40 | 770.00 | WFD |
| | Avoidance Action Litigation; O/cs w/WFD re: status of discovery and service of subpoenas on Noteholders | 1.10 | 434.50 | AMB |
| | Avoidance Action Litigation; Review affidavit of service for DTC Participants | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review emails from WFD, JNL and JG re: service of process on P.O.Box | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Review email from RGA re: not being noteholder | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Emails to/from JNL re: amending caption | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Emails to/from Epiq re: service of subpoenas on DTC participants, additional name to service list | 0.10 | 39.50 | AMB |
| | Avoidance Action Litigation; Prep of subpoenas for DTC Participants | 0.80 | 316.00 | AMB |
| | Avoidance Action Litigation; T/cs w/LLS re: service of foreign noteholders and foreign non-party discovery | 0.50 | 197.50 | AMB |
| | Avoidance Action Litigation; O/cs w/SP re: assignments and subpoenas | 0.10 | 39.50 | AMB |

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| | Avoidance Action Litigation; O/c w/WFD and CGP re: addresses to serve US based noteholders and foreign noteholders | 1.10 | 434.50 | AMB | |
| | Avoidance Action Litigation; T/c and email exchange w/I. deVyver re: BNY discovery | 0.30 | 148.50 | MCL | |
| | Avoidance Action Litigation; T/c w/ J. Pomper re: RGA LLC | 0.20 | 99.00 | MCL | |
| | Avoidance Action Litigation; T/c w/ M. Breen re: Stone Tower discovery | 0.20 | 99.00 | MCL | |
| | Avoidance Action Litigation; T/c w/DLS re: available process servers in various U.S locations | 0.30 | 127.50 | SMP | |
| | Avoidance Action Litigation; Internet research re: legitimacy of process servers per AMB | 1.00 | 425.00 | SMP | |
| | Avoidance Action Litigation; Calculate and prep table setting forth witness fees and mileage fees for service of subpoenas | 2.00 | 850.00 | SMP | |
| | Avoidance Action Litigation; Review, revise and finalize subpoenas and notices of subpoenas for service | 4.20 | 1,785.00 | SMP | |
| | Avoidance Action Litigation; O/cs w/AMB re: subpoenas and notices of subpoena for service | 0.30 | 127.50 | SMP | |
| | Avoidance Action Litigation; O/cs w/AMB re: service on noteholders and updating of entity comparison charts; research entity information and status for issuer defendants whose summons and complaint was returned to WMD; aggregate information re: entity names confirmed or provided by client and research address information for same; update entity name comparison chart to reflect new information; o/c w/WFD and AMB re: same, deciding appropriate course of action for service on confirmed and unconfirmed entities and research re: amending of names if such names turn out to be incorrect despite diligence in attempting to confirm same | 3.90 | 975.00 | CGP | |
| | Fee/Employment Applications; Review analysis and revise fee applications | 0.60 | 210.00 | JDG | |
| | Case Administration; Scan and save on system Affidavit of Service | 0.10 | 11.00 | MEB | |
| Jan-30-11 | Avoidance Action Litigation; Research re: improperly named defendants who are served at the appropriate address | 1.40 | 350.00 | CGP | |
| Jan-31-11 | Avoidance Action Litigation; Conf w/AHC re: discovery from Trustees | 0.30 | 165.00 | SCB | |
| | Avoidance Action Litigation; Attn to foreign discovery issues | 0.30 | 165.00 | WFD | |

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| Avoidance Action Litigation; O/c w/ AMB/CP re: subpoena responses | 0.50 | 275.00 | WFD | |
| Avoidance Action Litigation; Attn to motion | 0.40 | 220.00 | WFD | |
| Avoidance Action Litigation; T/c w/LLS re: discovery on foreign DTC Participants | 0.70 | 276.50 | AMB | |
| Avoidance Action Litigation; Email to EPIQ re: service of Notice of Subpoenas re: DTC Participants | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; Update nonparty DTC Participant discovery chart | 0.50 | 197.50 | AMB | |
| Avoidance Action Litigation; Review research re: timing of motion to extend time to serve defendants | 0.70 | 276.50 | AMB | |
| Avoidance Action Litigation; O/c w/SMP re: assignment to draft letter to Creditors committee | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; O/c w/WFD and CGP re: subpoena on Credit Agricole | 0.50 | 197.50 | AMB | |
| Avoidance Action Litigation; Review and edit CGP's email re: summarizing call w/A. Browsmon | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; Email and t/c w/L. Elbaum from DTC re: follow-up questions | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; O/c w/AHC re: summarizing discovery | 0.20 | 79.00 | AMB | |
| Avoidance Action Litigation; Review BNY's production | 1.10 | 434.50 | AMB | |
| Avoidance Action Litigation; T/c w/I. DyVyver re: BNY production | 0.10 | 39.50 | AMB | |
| Avoidance Action Litigation; Prep of email summarizing t/c w/S. Maddsen | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; T/c w/CGP and S. Maddsen re: subpoena | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; T/c w/CGP and A. Browsmon re: subpoena | 0.30 | 118.50 | AMB | |
| Avoidance Action Litigation; Review and prep subpoenas to/on DTC Participants | 0.40 | 158.00 | AMB | |
| Case Administration; Legal research re: validity of service to post office box per AMB in connection w/service of subpoenas to nonparty participants | 0.80 | 340.00 | SMP | |
| Avoidance Action Litigation; Research re: improperly named defendants who are served at the appropriate address; t/c w/AMB and A. Brozman re: subpoena on Credit Agricole Securities LLC; t/c w/AMB and S. Madsen re: subpoena served on Credit Suisse; o/c w/AMB re: t/cs; emails to/from AMB, WFD re: | 2.40 | 600.00 | CGP | |

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summary of t/cs; o/c w/WFD and AMB re:
same

| | | | |
|---|------|----------|-----|
| Fee/Employment Applications; Email to JNL re fee committee guidelines issue | 0.10 | 35.00 | JDG |
| Avoidance Action Litigation; Review of Supplemental Affidavit and Disclosure Statement | 0.40 | 140.00 | JDG |
| Avoidance Action Litigation; Review and analysis of spreadsheets requested by BrownGreer | 0.50 | 175.00 | JDG |
| Avoidance Action Litigation; Review of email received from BrownGreer | 0.10 | 35.00 | JDG |
| Avoidance Action Litigation; Prepare email in response to BrownGreer | 0.20 | 70.00 | JDG |
| Avoidance Action Litigation; Review and analysis of Debtors' Disclosure Statement for First Amended Joint Chapter 11 Plan | 0.90 | 315.00 | JDG |
| Avoidance Action Litigation; Review and analysis of First Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc | 0.80 | 280.00 | JDG |
| Avoidance Action Litigation; Review and analysis of Complaint against Lehman Brothers Holdings, Inc., Lehman CP | 0.50 | 175.00 | JDG |
| Avoidance Action Litigation; review Trustee document production and create chart of same | 4.50 | 1,125.00 | AHC |
| Avoidance Action Litigation; review correspondence | 0.20 | 50.00 | AHC |
| Avoidance Action Litigation; o/cs w/AMB re: discovery | 0.20 | 50.00 | AHC |
| Avoidance Action Litigation; file affidavit on docket and update pleadings spreadsheet re: same | 0.50 | 125.00 | AHC |
| Case Administration; Continue to scan, save on system, copy and tab subpoenas and notices of subpoena; prep cover letters for subpoenas that will be served by process server on 2/1/11; scan and save same on system; bring subpoenas to be served to process server; proof and edit email | 5.10 | 561.00 | MEB |

MATTER TOTALS: 340.80 \$112,332.00

MATTER: 4715-003

RE: Koch Avoidance Litigation

| | | | | |
|-----------|---|------|-------|-----|
| Jan-04-11 | Avoidance Action Litigation: Review recent emails re: Koch mediation status and issues | 0.10 | 59.50 | WAM |
| | Claims Administration and Objections; O/c w/MCL re: status, next steps | 0.10 | 55.00 | RRR |

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|----------------|---|------|-------------------|-----|-------|
| Jan-05-11 | Avoidance Action Litigation: Review recent emails re: Koch payment | 0.10 | 59.50 | WAM | |
| Jan-20-11 | Avoidance Action Litigation: T/c w/RRR re: status and follow-up w/client | 0.10 | 59.50 | WAM | |
| | Avoidance Action Litigation; T/c w/WAM re: status, next steps | 0.10 | 55.00 | RRR | |
| Jan-26-11 | Avoidance Action Litigation: Emails to/from RRR and review emails between RRR and clients and Orrick re: status and next steps | 0.30 | 178.50 | WAM | |
| | Claims Administration and Objections; Emails w/I. Wolk, J. Guy re: status of open issues | 0.10 | 55.00 | RRR | |
| | Avoidance Action Litigation; Rev'd email correspondence re: status of mediation notices, Koch payment | 0.30 | 148.50 | MCL | |
| | MATTER TOTALS: | 1.20 | \$670.50 | | |
| MATTER: | 4715-002 | | | | |
| RE: | Goldman Sachs Claims Dispute | | | | |
| Jan-11-11 | Avoidance Action Litigation; Review OCP Order regarding retention requirements and research ordinary course retention issue for overseas process server | 1.60 | 880.00 | JNL | |
| | Avoidance Action Litigation; Emails to/from WFD re: LBHI authority to retain without 327 retention under the 363(c) tests | 0.40 | 220.00 | JNL | |
| Jan-20-11 | Claims Administration and Objections: T/c w/Lafaire re: status | 0.20 | 119.00 | WAM | |
| | Claims Administration and Objections: O/c w/RRR and MCL re: status | 0.20 | 119.00 | WAM | |
| | Avoidance Action Litigation; O/c w/WAM, MCL re: report from A. LaFaire re: status | 0.10 | 55.00 | RRR | |
| Jan-26-11 | Avoidance Action Litigation; Review and respond to emails from WAM re: impact of debtors' revised plan on claims issues | 0.50 | 275.00 | JNL | |
| | Avoidance Action Litigation; Begin review of D/S | 1.60 | 880.00 | JNL | |
| | MATTER TOTALS: | 4.60 | \$2,548.00 | | |
| MATTER: | 4715-004 | | | | |
| RE: | CEAGO Avoidance Action | | | | |
| Jan-20-11 | Avoidance Action Litigation: T/c w/RRR re: status | 0.10 | 59.50 | WAM | |
| | Avoidance Action Litigation; T/c w/WAM re: status, next steps | 0.10 | 55.00 | RRR | |

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|------------|--|-------------|---------------------------|-------|
| Jan-26-11 | Avoidance Action Litigation; Review of email memo from AB re subpoenas to be served on various parties | 0.10 | 35.00 | JDG |
| Jan-28-11 | Avoidance Action Litigation; Perform legal research and analysis re service of process issues | 3.90 | 1,365.00 | JDG |
| | Avoidance Action Litigation; Prepare memo summarizing research and analysis of service of process issues | 0.30 | 105.00 | JDG |
| | MATTER TOTALS: | 4.50 | \$1,619.50 | |
| | Totals | 351.10 | <hr/> \$117,170.00 | |

EXHIBIT B

DISBURSEMENTS

Disbursements

Receipts

MATTER: **4715-001**
RE: SPV Avoidance Litigation

| | |
|---|----------|
| Federal Express Inv # | 32.34 |
| Filing Fee | 2,188.00 |
| Local Travel | 21.00 |
| Photocopy Expense | 41.60 |
| Postage Expense | 541.24 |
| Witness Fee | 840.00 |
| Jan-07-11 Elite (Car Service) Inv. # 1440468 (1-03-11 AMB) | 100.00 |
| Elite (Car Service) Inv. # 1440468 (1-04-11 AMB) | 100.00 |
| Jan-13-11 Working Dinner - AHC (12/07/10) | 10.00 |
| Working Dinner - AHC (12/08/10) | 20.00 |
| Working Dinner - AHC (01/10/11) | 6.96 |
| Working Dinner - AHC (01/06/11) | 17.00 |
| Jan-14-11 Elite (Car Service) Inv. # 1441139 (1-06-11 AMB) | 100.00 |
| Elite (Car Service) Inv. # 1441139 (1-10-11 CP) | 41.02 |
| Elite (Car Service) Inv. # 1441139 (1-10-11 AMB) | 100.00 |
| Elite (Car Service) Inv. # 1441139 (1-05-11 AMB) | 100.00 |
| Jan-21-11 Elite (Car Service) Inv. # 1442060 (1-14-11 AMB) | 100.00 |
| Jan-26-11 Local Travel Mileage Fee | 5.00 |
| Local Travel Mileage Fee | 5.00 |
| Local Travel Mileage Fee | 5.00 |
| Local Travel Mileage Fee | 5.00 |
| Local Travel Mileage Fee | 5.00 |

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|-----------|--|--------|
| | Local Travel Mileage Fee | 5.00 |
| | Local Travel Mileage Fee | 10.00 |
| | Local Travel Mileage Fee | 5.00 |
| | Local Travel Mileage Fee | 5.00 |
| | Local Travel Mileage Fee | 7.00 |
| Jan-28-11 | Witness Fee | 40.00 |
| | Mileage Fee | 21.00 |
| | Working Dinner s- AMB (1-25-11) | 18.00 |
| | Working Dinner s- AMB (1-24-11) | 20.00 |
| | Working Dinner s- AMB (1-10-11) | 8.26 |
| | Working Dinner - CP (1-10-11) | 10.25 |
| | Working Dinner s CP (1-06-11) | 11.25 |
| | Local Travel - CP (1-06-11) | 11.40 |
| | Local Travel Mileage Fee | 6.00 |
| | Local Travel Mileage Fee | 19.00 |
| | Local Travel Mileage Fee | 28.00 |
| | Local Travel Mileage Fee | 12.00 |
| | Local Travel Mileage Fee | 5.00 |
| | Local Travel Mileage Fee | 11.00 |
| | Local Travel Mileage fee | 10.00 |
| | Local Travel Mileage Fee | 43.00 |
| | Local Travel Mileage Fee | 6.00 |
| | Local Travel SunTrust Bank | 10.00 |
| | Elite (Car Service) Inv. # 1442918- AMB (01-20-11) | 100.00 |
| | Elite (Car Service) Inv. # 1442918- AMB (01-24-11) | 100.00 |
| | Elite (Car Service) Inv. # 1442918- AMB (01-25-11) | 100.00 |
| | Elite (Car Service) Inv. # 1442918- AMB (01-19-11) | 100.00 |
| | Elite (Car Service) Inv. # 1442918- CP (01-19-11) | 41.02 |
| Jan-31-11 | Lexis Nexis Inv. # 1101020284 | 21.49 |
| | Lexis Nexis Inv. # 1101020284 | 352.15 |
| | Demovsky Lawyer Service Inv.# Credit Agricole Securities | 154.00 |
| | Demovsky Lawyer Service Inv.# Barclays Capital Inc. | 169.00 |
| | Demovsky Lawyer Service Inv.# Brown Brothers Harriman & Co. | 154.00 |
| | Demovsky Lawyer Service Inv.# Credit Suisse Securities (USA) LLC | 169.00 |
| | Demovsky Lawyer Service Inv.# 299684 | 558.00 |
| | Demovsky Lawyer Service Inv.# 299603 | 587.95 |
| | Demovsky Lawyer Service Inv.# 299716 | 602.95 |
| | Demovsky Lawyer Service Inv.# 299699 | 358.95 |
| | Demovsky Lawyer Service Inv.# 299701 | 377.22 |

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|----------------|---|--------------------|
| | Demovsky Lawyer Service Inv.# 299604 | 373.95 |
| | Demovsky Lawyer Service Inv.# 299572 | 239.00 |
| | Demovsky Lawyer Service Inv.# 299601 | 154.00 |
| | Demovsky Lawyer Service Inv.# 299602 | 198.00 |
| | Demovsky Lawyer Service Inv.# 299715 | 358.95 |
| | Demovsky Lawyer Service Inv.# 299739 | 348.95 |
| | Demovsky Lawyer Service Inv.# Jersey Pershing LLC | 224.00 |
| Feb-04-11 | ALM Invoice # MA00011090 | 10.80 |
| | Witness Fee - Void | -40.00 |
| | Mileage Fee - Void | -21.00 |
| | MATTER TOTALS: | \$10,498.70 |
| MATTER: | 4715-002 | |
| RE: | Goldman Sachs Claims Dispute | |
| | Federal Express Inv # | 108.98 |
| | MATTER TOTALS: | \$108.98 |
| MATTER: | 4715-004 | |
| RE: | CEAGO Avoidance Action | |
| Jan-31-11 | Facsimiles | 2.00 |
| | Lexis Nexis Inv. # 1101020284 | 58.28 |
| | MATTER TOTALS: | \$60.28 |
| | Totals | \$10,667.96 |